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7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA -oOo-			
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9	UNITED STATES OF AMERICA,			
10	Plaintiff,	2:16-CR-279-JAD-PAL		
11	vs.	STIPULATION TO RESET DEADLINES		
		(Second Request)		
12	JOSHUA WASHINGTON,			
13	Defendant.			
14	IT IS HEREBY STIPULATED AND AGREED, by and between Steven W.			
15	Myhre, Acting United States Attorney, and Robert Knief, Assistant United States			
16	Attorney, counsel for the United States of America, and Terrence Jackson, counsel for			
17	Defendant Joshua Washington, that the deadline for the defendant to additional,			
18	supplemental, or modified pleadings regarding defendant's Motion to Suppress			
19	Evidence (ECF #54), be reset for September 18, 2017, or a date thereabouts convenient			
20	for the Court.			
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1	This stipulation is entered into for the following reasons:		
2	1.	New defense counsel has	s been appointed and the additional time is
3	needed for counsel to become familiar with the facts of the case and evaluate, research,		
4	and draft any pleadings related to the previously filed motions.		
5	2.	Defendant is in custody	and does not object to the continuance.
6	3.	For the reasons stated a	bove, the ends of justice would best be served by a
7	continuance of the government deadline.		
8	4.	Additionally, denial of tl	nis request for continuance could result in a
9	miscarriage of justice.		
10	5.	The additional time requ	uested by this Stipulation is excludable in
11	computing the time within which the trial herein must commence pursuant to the		
12	Speedy Trial Act, Title 18, United States Code, Sections 3161(h)(3)(A) and (h)(7)(A),		
13	considering the factors under Title 18, United States Code, Sections 3161(h)(1)(D),		
14	(h)(7)(A), (h	n)(7)(B)(i), and (h)(7)(B)(iv)	
15	6.	This is the second reque	st for a continuance filed herein.
16	DAT	ED this <u>30th</u> day of Augus	st, 2017.
17			Respectfully submitted,
18			STEVEN W. MYHRE
19			Acting United States Attorney
20	/o / Torror	nce Jackson	/s/ Robert Knief
21	TERRENC	E JACKSON Defendant	ROBERT KNIEF Assistant United States Attorney
22	Counselior	Deteriuant	Assistant Onneu States Attorney
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1 UNITED STATES DISTRICT COURT DISTRICT OF NEVADA 2 -oOo-3 UNITED STATES OF AMERICA. 4 Plaintiff, 2:16-CR-279-JAD-PAL 5 FINDINGS OF FACT, vs. CONCLUSIONS OF LAW. 6 JOSHUA WASHINGTON. AND ORDER 7 Defendant. 8 FINDINGS OF FACT 9 Based upon the pending Stipulation of counsel, and good cause appearing 10 therefore, the Court finds that: 11 1. New defense counsel has been appointed and the additional time is 12 needed for counsel to become familiar with the facts of the case and evaluate, research, 13 and draft any pleadings related to the previously filed motions. 14 2. The Defendant is in custody and does not object to the continuance. 15 3. For the reasons stated above, the ends of justice would best be served by a 16 continuance of the defense deadlines. 17 4. Additionally, denial of this request for continuance could result in a 18 miscarriage of justice. 19 CONCLUSIONS OF LAW 20 The ends of justice served by granting said continuance outweigh the best 21 interest of the public and the Defendant in a speedy trial, since the failure to grant 22 said continuance would be likely to result in a miscarriage of justice, would deny the 23

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1	parties herein sufficient time and the opportunity within which to be able to effectively		
2	and thoroughly negotiate the case and prepare for trial, taking into account the		
3	exercise of due diligence.		
4	The continuance sought herein is excludable under the Speedy Trial Act, Title		
5	18, United States Code, Sections 3161(h)(1)(D), (h)(7)(A), (h)(7)(B)(i), and (h)(7)(B)(iv).		
6	ORDER		
7	IT IS THEREFORE ORDERED that the defendant's additional, supplemental,		
8	or modified pleadings regarding defendant's Motion to Suppress (ECF #54), are due		
9	by the close of business on the 18th day of September, 2017.		
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11	DATED this 31st day of August, 2017.		
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13	Tigge a. Teen		
14	HONORABAE PEGGY A. LEEN UNITED STATES MAGISTRATE JUDGE		
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